

EXHIBIT A

Oleski, Nicholas R.

From: Mike Stavnick <mstavnick@smdklaw.com>
Sent: Thursday, April 9, 2020 3:38 PM
To: Stewart, Roger E.; Oleski, Nicholas R.; Laughlin, Debra C.
Subject: Rule 11 OPI v. Jest

Gentlemen:

I am sorry that it has come to this, but having now been able to review again the documents, the motion, our mass of former discovery production and speak to my clients, I must inform you that we will be seeking sanctions against your clients and your firm for the recent conduct. There will most likely be a separate lawsuit and/or filings as well.

We have learned that OPI and its agents are allegedly strong arming vendors/suppliers in China to cooperate with it in this lawsuit. They are allegedly offering work in return for false statements and information and refusing work otherwise.

What in the world is going on, this is just a contract dispute and your client has put itself and your firm in this awful position. Was it so desperate after losing so badly on summary judgment that it has come to this.

In addition to that reprehensible conduct, which sounds in my opinion, like witness tampering and falsifying evidence, the recent conduct violates the parties' confidentiality agreement, the Court's Protective Order in this case, PRC Anti-Unfair Competition Law, the International Anti-Bribery and Fair Competition Act of 1998, the Defend Trade Secrets Act of 2016 (DTSA), the Federal Trade Secrets Act and the Ohio Trade Secrets Act.

We will be requesting a separate hearing with the Court, requesting your depositions as counsel, OPI's deposition on this issue, Rhino's reps depositions and the deposition of Chinese nationals who signed the declarations and anyone else involved.

I have never seen anything like this. Please govern yourself accordingly.

Very truly yours,
Michael R. Stavnick, Esq.

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